

Summary: I support RM-10868. It presents the most logical, well-thought restructuring proposal without major disruption of the existing structure. Further, it continues in the same vein that the FCC started in its last restructuring Rule Making.

1. Maintains a three-license structure w/tech as entry level granting limited HF privileges.
2. Keeps Element 1 telegraphy requirement for General and Extra Class licenses.
3. Removes test pool questions from published Q&A manuals and requires applicants to learn rather than memorize the examination material. Substitute similar questions and answers in Q&A manuals to necessitate **study and understanding** of Amateur Radio theory as has been done successfully in the past. The present method of providing test pool questions and answers for memorization does not foster an *“expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronics experts”* as provided for in Part 97.
4. The no code Technician class license has been demonstrated to be a highly successful entry-level license, providing sufficient benefit to those who do not wish to advance further (particularly with the proposed HF privileges). In the words of the FCC *“We believe that the no-code Technician Class operator license has replaced the Novice Class operator license as the entry-level license class of choice.”*
5. However, I believe that providing **lifetime** CW credit to Novice class licensees is not a necessary change as credit has already been granted without a time limitation. Again, in the words of the FCC, Part 97.505(a)(5) *“An unexpired (or expired) FCC-granted Novice Class operator license grant: Element 1.”*
6. Overall RM-10868 best represents the restructuring changes that reflect the traditions of the Amateur Radio Service while providing a code-free entry-level license. There are other radio services available for hobbyists desiring a non-technical radio hobby.